

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

CHARLOTTE CHARLES and TIM DUNN,  
Individually and as Co-Administrators of the  
ESTATE OF HARRY DUNN, and NIALL  
DUNN, Individually,

*Plaintiffs,*

v.

ANNE SACOOLAS and JONATHAN  
SACOOLAS,

*Defendants.*

Case No.: 1:20-cv-01052

**PLAINTIFFS' REPLY TO THE UNITED STATES' RESPONSE TO PLAINTIFFS'  
NOTICE OF NO OPPOSITION TO THE GOVERNMENT'S MOTION FOR LEAVE**

Plaintiffs, through undersigned counsel, file this Reply to the United States' Response to Plaintiffs' Notice of No Opposition to the Government's Motion for Leave and state as follows.

On July 23, 2021, the Government filed a *Motion For Leave To File Protective Order And Supporting Ex Parte, In Camera Position*, Dkt. No. 62 ("*Motion for Leave*"). In addition to a proposed order on the Motion for Leave, the Government attached the following documents to its motion: (1) a *Statement of Interest And Memorandum In Support Of Motion For Protective Order*, Dkt. No. 62-2, and (2) the *Motion For Protective Order* itself and its [Draft] *Order Granting Protective Order*, Dkt. No. 62-3 (collectively, "*Motion for Protective Order*"). On July 26, 2021, the Court scheduled a hearing on the *Motion for Leave* for August 13, 2021. Also on July 26, 2021, Plaintiffs filed a notice, Dkt. No. 64, to indicate that they do not object to the Government's *Motion for Leave* but oppose its *Motion for Protective Order*.

On July 28, 2021, the Government filed a response to the Plaintiffs' notice, stating, "the United States requests that this Court resolve the unopposed motion for leave without a hearing and hear argument on the motion for a protective order *itself* on August 13, 2021." Dkt. No. 66 at 1. More than one week has passed since the Government's filing and a week remains before the hearing scheduled for August 13. Plaintiffs file this Reply to the Government in an abundance of caution and in the event that the Court should grant the Government's request and hear argument on the *Motion for Protective Order* on August 13. Accordingly, Plaintiffs append an opposition to the *Motion for Protective Order* to provide Plaintiffs' position to the Government and to Defendants sufficiently in advance of the hearing on August 13.

Dated: August 6, 2021

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 6, 2021, I electronically filed the foregoing using CM/ECF, which serves a copy on all counsel of record.

Dated: August 6, 2021

/s/  
Jay Rohit Nanavati